

Subject: Re: Fw: Dairy lagoons
To: CN=Eric Winiecki/OU=R10/O=USEPA/C=US@EPA
Cc: CN=Jennifer MacDonald/OU=R10/O=USEPA/C=US@EPA Kowalski.Edward@epa.gov
CN=Marie Jennings/OU=R10/O=USEPA/C=US@EPA Pongkhamsing.Chan@epa.gov
From: CN=Thomas Eaton/OU=R10/O=USEPA/C=US
Submit Time: 10/25/2012 19:40:05

Thanks Eric,

Actually the checklists that I was asking about are completed checklists for the 5 dairies. According to Nora, this is what is supposed to confirm that everything on the dairy meets NRCS standards. I thought Nora said these checklists were publicly available



cons. Com. min elements.doc
elements.doc

cons. Com. min

Tom Eaton
Director
Washington Operations Office
USEPA, Region 10
360-753-8086

Eric Winiecki---10/25/2012 12:06:11 PM---Tom, I think this is the checklist you just requested:

From: Eric Winiecki/R10/USEPA/US
To: Thomas Eaton/R10/USEPA/US@EPA
Cc: Jennifer MacDonald/R10/USEPA/US@EPA, Marie Jennings/R10/USEPA/US@EPA,
Kowalski.Edward@epa.gov, Pongkhamsing.Chan@epa.gov
Date: 10/25/2012 12:06 PM
Subject: Fw: Dairy lagoons

Tom,

I think this is the checklist you just requested:

<http://agr.wa.gov/FoodAnimal/Livestock-Nutrient/DairyNutrientMgmtPlans.aspx>

Please see Chan's message below. Also, here is a key document:

[attachment "Lagoon-NRCSCriteriaRevisions.pdf" deleted by Thomas Eaton/R10/USEPA/US]

This document shows changes to the NRCS standards for lagoon lining over time. Before 1979, there were apparently no NRCS standards related to lagoon seepage. Before 2001, there was no specific level of permeability that had to be met. Even if all the lagoons in Yakima County were constructed to meet the NRCS standards that were in place at the time, many lagoons were built before 1979 when there were no NRCS standards, or from 1979 to 2001 when the standards were weak. Many of those lagoons are still in operation today, and are grandfathered in --- to the best of my knowledge there is no requirement to upgrade existing lagoons to meet current standards (maybe if the dairy changes hands). For example, some of the dairy cluster lagoons were constructed in the early-to-mid '70's, and perhaps some in the late '60's.

The problem that I see is that current NRCS standards can result in impacted groundwater, especially when lagoon systems are large and cover a lot of surface area. And if they haven't been upgraded, the older lagoons likely leak more --- possibly much, much more if they are unlined and built in highly permeable soils such as those that underlie the dairy cluster and the Haak dairy.

If the dairies had responded to our information request, we would have a better handle on this issue. Hopefully we will get this information from them soon.
Eric

----- Forwarded by Eric Winiecki/R10/USEPA/US on 10/25/2012 11:24 AM -----

From: Chan Pongkhamsing/R10/USEPA/US
To: Eric Winiecki/R10/USEPA/US@EPA
Date: 10/24/2012 12:28 PM
Subject: Re: Fw: Dairy lagoons

Eric,

Yes, we made thorough inquiries about whether any lagoons (waste storage facility) in the Lower Yakima Valley are lined synthetically or engineered lining as well as asking about the requirements. Here's who we talked to:

1. Ginny Prest - WSDA
2. Larry Johnson - NRCS
3. Laurie Crowe - Yakima Conservation District, NRCS
4. Harold MacLean - Yakima County Public Services
5. WDOE's Dam Safety Program
6. [attachment "Memo to Yakima Project File 2-6-12.docx" deleted by Thomas Eaton/R10/USEPA/US]

[attachment "Memo to Yakima Project File 2-6-12 Laurie Crowe.docx" deleted by Thomas Eaton/R10/USEPA/US] [attachment "Memo to Yakima Project File 2-16-12 Larry Johnson.docx" deleted by Thomas Eaton/R10/USEPA/US]

Overall, the message I received is that if a dairy is not funded by NRCS then they do not have to abide by any requirements for lagoon lining. Here's a list of Yakima County dairies that have or had NRCS funding that Larry Johnson provided.

[attachment "Yakima_contracts 04 03 2012.pdf" deleted by Thomas Eaton/R10/USEPA/US]

Hope this helps.

Chan Pongkhamsing
Aquatic Resources Unit
Ecosystems, Tribal, and Public Affairs Office
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900, ETPA-083
Seattle, Washington 98101
(206) 553-1806